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AO 91 (Rev. 11/11) Criminal Complaint

SEALED

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Court
Southern District of Texas
FILED

MAY 28 2020

David J. Bradley, Clerk of Court

United States of America

v.

Dana RODRIGUEZ

Case No.

C-20-1134M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05-14-2020 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21, USC 846

Offense Description

Knowingly, intentionally and unlawfully conspired to possess with the intent to distribute a controlled substance in Schedule II of the Controlled Substances Act of 1970, to wit: approximately one kilogram (AGW) of cocaine.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed. R. Crim. P. 4.1.
And probable Cause found:

Date:

May 19, 2020

City and state:

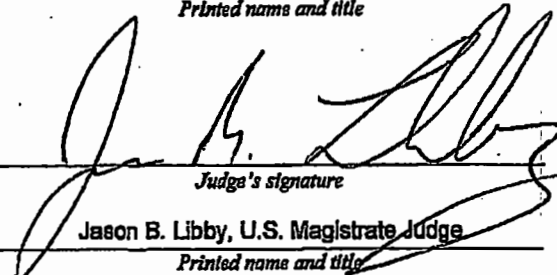
Corpus Christi, Texas



Complainant's signature

Eric Hemping, DEA Task Force Officer

Printed name and title



Judge's signature

Jason B. Libby, U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

[REDACTED]
RODRIGUEZ, Dana

On April 04, 2020 at approximately 2:18 p.m. Corpus Christi Police Department responded to a single vehicle crash in the 2800 block of Harrington Drive involving a black Cadillac Escalade. The driver, later identified as TARGET 1, was found to be in possession of a handgun, six clear bags of cocaine, ecstasy pills, numerous empty bags, and a scale. Target 1 was the sole occupant of the vehicle.

On April 04, 2020, at approximately 3:00 p.m. DEA TFO Hempling was contacted by CCPD and advised of the arrest. DEA TFO Hempling and TFO Trevino responded to continue the investigation. As a result of the investigation it was determined that an additional kilogram (kilo) of cocaine was at a local hotel room #109 and that the TARGET 1's girlfriend, later identified as Dana RODRIGUEZ, was in possession of the kilogram of cocaine.

At approximately 8:15 p.m. DEA TFO Hempling, TFO Trevino, SA Paul Stewart, and GS Ajay Patel arrived at the hotel where the kilogram of cocaine was located.

At approximately 8:40 p.m., RODRIGUEZ was contacted by TARGET 1 and instructed to depart the room and go to a nearby gas station without removing anything from the room. DEA TFO Trevino was observing room #109 and observed [REDACTED] depart room #109 with a large floral print bag. [REDACTED] took the floral print bag into room #210 and then re-emerged from the room after approximately 15 seconds without the floral print bag. [REDACTED] was immediately detained by TFO Trevino.

A short time later DEA TFO Hempling, SA Paul Stewart, and GS Patel entered room #109 with written consent. Agents found that room #109 was not occupied. DEA TFO Hempling, SA Paul Stewart, and GS Patel discovered that the cocaine had been moved from room #109. Another call was placed to the RODRIGUEZ who advised that the cocaine was moved to the "other room" meaning room #210.

DEA TFO Trevino and SA Paul Stewart requested and were granted verbal consent to enter room #210. Upon entering, TFO Trevino and SA Stewart observed that the room was pristine and seemingly

untouched. DEA TFO Trevino and SA Stewart then observed the bag that [REDACTED] had taken from room #109 under the sink in room #210.

DEA TFO Trevino informed [REDACTED] that he had observed [REDACTED] depart room #109 with the floral bag and then emerge from room #210 without the bag. [REDACTED] told Trevino that she had been told by the TARGET 1' girlfriend to take the bag from room #109 and put the bag in room #210. [REDACTED] asserted that the bag did not belong to her.

DEA TFO Trevino and SA Stewart opened the bag and located a package of size and composition consistent with a kilogram of cocaine. In addition, a semi-automatic handgun and large zip lock baggie of a green leafy substance were found in the bag. Also contained in the bag was a pink hand purse which contained a smaller quantity of cocaine.

At approximately 11:00 p.m. TFO Trevino advised [REDACTED] of her Miranda Warning, as witnessed by TFO Hemping. [REDACTED] admitted to knowledge of the narcotics contained in the floral print bag. [REDACTED] also admitted that she moved the narcotics from room #109 to room #210 after RODRIGUEZ directed her to do so.

At approximately 11:30 p.m. TFO Hemping spoke with RODRIGUEZ and explained that she was not under arrest and was free to leave. TFO Hemping told RODRIGUEZ that travel back to the Super 8 Hotel, 11217 IH 37, Corpus Christi, Texas, would be arranged for her if she did not have any other means of travel. RODRIGUEZ stated that she would wait for a ride back to the hotel. TFO Hemping asked RODRIGUEZ if she would answer some questions regarding what happened at the hotel and she said that she would. RODRIGUEZ explained to TFO Hemping that when RIVAS had placed the call to her while she was in the Room #109 with [REDACTED] that she got scared, and as a result [REDACTED] took a bag containing a kilo of cocaine and other drugs upstairs to room #210.



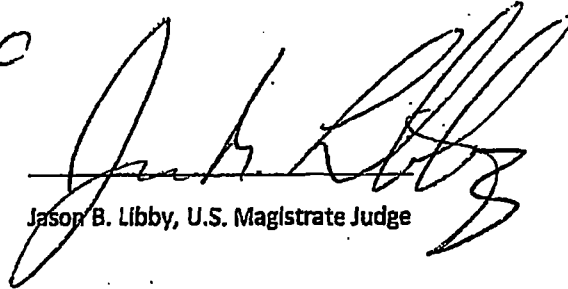
Eric K. Hemping

Task Force Officer, DEA

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P
4.1, and probable cause found:

Date: May 14, 2020

City and State: Corpus Christi, Texas


Jason B. Libby, U.S. Magistrate Judge